

U.S. Department of Justice USDS SDNY

United States Att Southern District

The Silvio J. Mollo Buildi One Saint Andrew's Place New York, New York 100

DOC #:

May 31, 2013

The Honorable Kimba M. Wood United States District Judge United States District Court for the Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Chambers 1610 New York, New York 10007

MEMO ENDORSED

Rc:

United States v. Frederic Cilins

13 Cr. 315

Dear Judge Wood:

The Government writes to respectfully request, with consent of defense counsel, that the Government be permitted to submit a memorandum in opposition to defendant's Motion to Modify Conditions of Release by no later than June 6, 2013. On May 29, 2013, the defendant filed a motion to modify the conditions of release that had been set by Judge Maas on May 15, 2013 at the time of defendant's initial presentment in this district. I have spoken with Michelle P. Smith, counsel for the defendant, and Ms. Smith does not object to the Government's request to file its memorandum by June 6, 2013.\*

A hearing will be held on Thursday, June 20 at 10:30 a.m.

Respectfully submitted,

PREET BHARARA

United States Attorney

By:

Assistant United States Attorney

Tel. No.: (212) 637-2599

Bruce H. Lehr, Esq. (via e-mail) cc: Michelle P. Smith, Esq. (via e-mail)

6313 Kinka M. Wood

KIMBA M. WOOD U.S.D.J.

<sup>\*</sup> The Government has also learned from your Honor's deputy elerk that the Court would be available for a hearing on this matter during the week beginning June 17, 2013. The Government is generally available that week. Ms. Smith has advised that her availability that week is limited to June 19 and June 20. SO ORDERED: N.Y., N.Y.